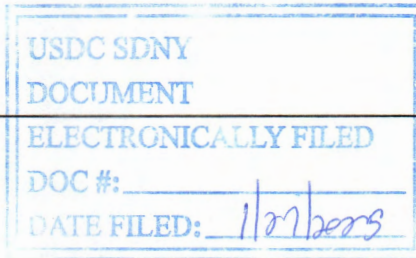


U.S. Department of Justice



United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

January 24, 2025

BY ECF

The Honorable Colleen McMahon
United States District Judge
500 Pearl Street
New York, NY 10007

Re: *Knight First Amendment Institute v. Central Intelligence Agency, et al.*, 22 Civ.
1542 (CM)

Dear Judge McMahon:

This Office represents the defendant agencies in this Freedom of Information Act (FOIA) case. We write jointly with counsel for plaintiff to provide a status report, as proposed in our November 26, 2024 status report, ECF No. 60, which the Court endorsed, ECF No. 61. We now propose a schedule that will push this case toward prompt resolution, consistent with the Court's most recent Order.

Since the November status report, the parties have continued their efforts to narrow the issues. Plaintiff has limited its potential challenges to three discrete sets of records: one set produced by the Department of Justice's Office of Information Policy (OIP), another set by its Criminal Division (CRM), and a single record produced by the Federal Bureau of Investigation (FBI). Earlier today, OIP provided plaintiff a draft Vaughn index for the specific records that plaintiff still has questions about, except for 36 pages which OIP will complete next week. CRM is still preparing its draft Vaughn index, and plaintiff has agreed to accept the draft by February 21. Plaintiff has further agreed to provide the government with a list of records that it intends to challenge by February 28. After the government receives and reviews this list, the parties will confer about a proposed schedule on cross-motions for summary judgment.

We therefore respectfully suggest that the parties provide a status report, including if necessary a proposed a schedule on cross-motions for summary judgment, by March 5. The parties anticipate proposing a briefing schedule to begin at the end of March or early April and conclude by the end of May 2025, depending on the extent and specific nature of Plaintiff's challenges.

yes

Honorable Colleen McMahon
January 24, 2025

Page 2

We thank the Court for its attention to this matter.

Respectfully submitted,

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cc: Counsel for plaintiff (via ECF)